SOUTHERN DISTRICT OF NEW YORK	
IN RE THE BEAR STEARNS COMPANIES, INC. SECURITIES, DERIVATIVE, AND ERISA LITIGATION	Master File No.:  08 M.D.L. 1963 (RWS)
This Document Relates To:  Securities Action, No. 08 Civ. 2793 (RWS)	ECF Case  Oral Argument Requested
JAMES M. CROWE and VALERIE M. CROWE,  Plaintiffs,  v.	Index No.: 09 Civ. 778 (RWS)
JPMORGAN CHASE & CO., ALAN D. SCHWARTZ, SAMUEL L. MOLINARO, JR., and ALAN C. GREENBERG,  Defendants.	
BRUCE S. SHERMAN,  Plaintiff,  v.	x : : Index No.: : <u>09 Civ. 8161 (RWS)</u> :
BEAR STEARNS COMPANIES INC., JAMES CAYNE, WARREN SPECTOR and DELOITTE & TOUCHE LLP,  Defendants.	
	X

-----X VIVINE H. WANG, Index No.: 11 Civ. 5643 (RWS) Plaintiff. ٧. THE BEAR STEARNS COMPANIES LLC, J.P.MORGAN SECURITIES LLC; J.P.MORGAN CLEARING CORP., DELOITTE & TOUCHE LLP, ALAN D. SCHWARTZ, ALAN C. GREENBERG, JOEY ZHOU, and GARRETT BLAND, Defendants. SRM GLOBAL MASTER FUND LIMITED PARTNERSHIP, Index No.: 13 Civ 2692 (RWS) Plaintiff. v. THE BEAR STEARNS COMPANIES LLC (F/K/A BEAR STEARNS COMPANIES INC.), ALAN D. SCHWARTZ, SAMUEL L. MOLINARO, JR., JAMES CAYNE, WARREN SPECTOR and DELOITTE & TOUCHE LLP. Defendants.

## **NOTICE OF MOTION TO QUASH**

PLEASE TAKE NOTICE THAT, upon the pleadings and papers in this matter, the accompanying memorandum of law, and the declaration of Jessica S. Carey and the exhibits annexed thereto, Defendants The Bear Stearns Companies Inc., now known as The Bear Stearns Companies LLC, JPMorgan Chase & Co., J.P. Morgan Securities LLC, J.P. Morgan Clearing Corp., Joe Y. Zhou, and Garrett Bland will move

this Court, before the Honorable Robert W. Sweet, on November 13, 2013 at 12:00 pm, or at a date and time to be determined by the Court, for an order pursuant to Federal Rule of Civil Procedure 45(c)(3) and the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. § 78u-4(b)(3)(B), quashing the subpoenas seeking deposition testimony from third parties Jeffrey Verschleiser, Thomas Marano, Matthew Tannin, and Ralph Cioffi. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: October 15, 2013 New York, NY

Respectfully Submitted,

PAUL, WEISS, RIEKIND, WHARTON & GARRISON LLP

By:

Brad S. Karp (bkarp@paulweiss.com)

Eric S. Goldstein (egoldstein@paulweiss.com)

Jessica S. Carey (jcarey@paulweiss.com)

Jonathan Hurwitz (jhurwitz@paulweiss.com)

1285 Avenue of the Americas

New York, New York 10019-6064

Tel. (212) 373-3000

Fax (212) 757-3980

Attorneys for Defendants The Bear Stearns Companies Inc. (N/K/A The Bear Stearns Companies LLC), JPMorgan Chase & Co., J.P. Morgan Securities LLC, J.P. Morgan Clearing Corp., Joe Y. Zhou, and Garrett Bland